From: PETERSON Jenn L

To: <u>Eric Blischke/R10/USEPA/US@EPA</u>

Subject: FW: LWG Eco SLVs **Date:** 01/25/2007 10:53 AM

Eric.

Jim just called me - is this the e-mail you are looking for? I was trying to coordinate the tables with Bob Gensemer regarding the ARKEMA and in-water numbers.

-Jennifer

-----Original Message-----**From:** PETERSON Jenn L

Sent: Wednesday, January 24, 2007 12:35 PM

To: 'Robert Gensemer'

Cc: Goulet.Joe@epamail.epa.gov; Shephard.Burt@epamail.epa.gov; davoli.dana@epa.gov

Subject: LWG Eco SLVs

Bob.

After talking to you yesterday about the ARKEMA numbers, I noticed some problems with our water SLV table developed by the LWG and revised Oct. 13, 2006. The values in the final Table 1 for the inwater RI still have some problems. Most notably is the PCB numbers. All aroclors have to be below 0.014 ug/L- that is how the AWQC is applied. This is one case where I think ARKEMA has it right, and the LWG table has it wrong. The numbers should be indicated the same way as the DDT isomers. Obviously, we cannot have any PCB aroclors exceeding 0.014 - we shouldn't be going to Tier II values in this case, as many of the Tier II Aroclor values exceed the AWQC.

There is also a discrepancy in the LWG dioxin value. The LWG table has the chronic number reported as 0.001 ug/L. The source that should have been used for dioxin is the chronic AWQC from ODEQ of 0.000038 ug/L - one that interestingly ARKEMA also reports in their tables.

I also still think the DEQ Table 33C values should not have been used unless there was no Canadian number available (I think this was a part of Burt's hierarchy). These are not risk based numbers, and ARE NOT AWQC values. I checked several "ODEQ" values taken from Table 33C, and there were actually more relevant values available from Canada (e.g. see hexachlorobutadiene number from 33C reported as 90 ug/L acute and 9.3 chronic. The Canadian value is 1.3 ug/L. Also Methylene chloride - ODEQ numbers 11,000 and 2,000 - the Canadian number is 98.1; TCE or trichloroethene LWG number is 45,000 and 21,900 ug/L and the Canadian number is 21 ug/L; PCE or tetrachloroethene LWG number is 5,280 and 840 - Canadian number is 111 ug/L). I didn't check all of them - however, this could drastically change the results of a TZ water screening analysis off some sites.

ARKEMA's problem with the 33C values is that they use these values before other sources (e.g. see the DDE screening values used in Section 5, Table 2 of the Parametrix revised DRAFT). It appears the NAWQC did not make it into the table, at least for the case of DDT and isomers. Somehow the 0.001 ug/L chronic number was not selected - see the LWG table for the appropriate designations. Table 5 in this section appears to report the values correctly.

Hopefully these two tables can be coordinated and revised.

-Jennifer